

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

EXPERIMENTAL PRESORTED PRIORITY  
MAIL RATE CATEGORIES, 2001

Docket No. MC2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORY OCA/USPS-T3-2  
(April 12, 2001)

The United States Postal Service hereby files this objection to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T3-1, filed on April 5, 2001.

The interrogatory is directed to witness Robert Kalenka. Mr. Kalenka is the Senior Vice President for ADP Financial Services, Inc., and is testifying as a postal industry witness on behalf of the Postal Service. In three subparts, the OCA requests the following:

- (a) What percent of ADP's Priority Mail volume is currently mailed at the \$3.50 one-pound Priority Mail rate?
- (b) In 1999 and 2000, what was ADP's total Priority Mail volume?
- (c) In 1999 and 2000, what percent of ADP's Priority Mail volume was mailed at the two-pound rate?

The Postal Service objects to the interrogatory for two reasons. First, it requests information which is irrelevant to this proceeding. The volume of Priority Mail generated by any one particular postal customer has no bearing on the question of whether the Commission should recommend the requested experimental Priority Mail presort classifications and rates.

Second, it is the long-standing policy of the Postal Service, except as may otherwise be required by law, not to disclose the mail volume generated by any particular postal customer. The Postal Service considers such information to be commercially-sensitive, privileged information. Such information could be used by delivery firms in competition with the Postal Service<sup>1</sup> to refine or bolster their competitive marketing strategies, to the detriment of the Postal Service. Accordingly, the Postal Service does not consider it to be in keeping with good business practice to publicly disclose the mail volumes specific to any particular customers.

The Postal Service is authorized to state that ADP Financial Information Services, Inc., also objects to the requested public disclosure. As a provider of mailing services for numerous clients, ADP competes with other mailing service providers and does not wish for its competitors to know the aggregate volume of mail that it generates or prepares. ADP considers such information proprietary, confidential and competitively sensitive.


Accordingly, the Postal Service objects to the requested public disclosure of ADP mail volumes disaggregated by year and by postal rate increment.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

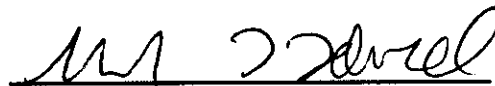
  
\_\_\_\_\_  
Michael T. Tidwell

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<sup>1</sup> Firms which, to the Postal Service's knowledge, do not routinely publicly disclose specific customer volumes.

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "M. Tidwell", is written over a horizontal line.

Michael T. Tidwell

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April 12, 2001